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May 14, 2024

**VIA CM/ECF**

The Honorable José R. Almonte, U.S.M.J  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
Court Room PO 9  
50 Walnut Street  
Newark, New Jersey 07101

**Re: LORENZO v. THE BOROUGH OF PALISADES PARK, NEW  
JERSEY et al.  
Civil Action No.: 2:23-cv-21849-CCC-JRA**

Dear Judge Almonte:

This office represents plaintiff, David Lorenzo, in the above matter.

Pursuant to the Court's April 16, 2024 text order, we filed plaintiff's first amended complaint (ECF No. 18) and served it on the two new defendants, Jae Park and Stephanie S. Jang on May 1<sup>st</sup> and 2<sup>nd</sup> (ECF Nos. 22 and 23).

Roshan Shah, Esq. has advised that he will be appearing on behalf of defendants, Jang and Park.

Scott Fahrney, Esq. will continue as counsel for the defendants named in plaintiff's original complaint—the Borough of Palisades Park, Mayor Kim, and Councilman Suk.

Both Mr. Shah and Mr. Fahrney expect to file motions to dismiss the first amended complaint under *Fed.R.Civ.P.* 12(b)(6).

To that end, all counsel conferred and agreed to the following briefing schedule subject to the Court's approval:

All defendants will file motions to dismiss no later than June 7, 2024.

Plaintiff will file opposition to the motions no later than July 1, 2024.

Defendants will file reply briefs no later than July 8, 2024.

This would allow the Court to set July 14, 2024 as the return date of these applications.

If this schedule is acceptable to the Court, we respectfully request that an appropriate scheduling order be entered. If Your Honor would like to address any aspect of this request, we would be happy to set up a phone or video conference to do so.

Respectfully,

s/ Leonard E. Seaman  
LEONARD E. SEAMAN

LES/me

cc: R. Scott Fahrney , Jr., Esq. (via CM/ECF)  
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